

EXHIBIT F

From: [Amber Magee](#)
To: [Hawkins, Ryan B. \(SDO\)](#); [Edlin, Elise \(SFO\)](#); [Piepmeier, Sarah \(SFO\)](#); [Griggs, Angela \(SFO\)](#)
Cc: [Ryan Caughey](#); [Max Tribble](#); [Kalpana Srinivasan](#); [Bryce T. Barcelo](#); [Stacy Schulze](#); [Vanessa Keller](#); [Maria Romo](#); [Alex Kaminsky](#); [*Cisco-Paltalk-Service](#)
Subject: Re: Paltalk v. Cisco: Cisco's Outstanding Depositions
Date: Thursday, October 6, 2022 2:58:23 PM

Thanks for the agreement, Ryan.

Let's schedule Barave for Tuesday, October 11th and let's plan to start his deposition at 8:30am PT. Please also send us the final list of topics that Barave will cover by 5pm CT tomorrow.

Amber Magee

From: Hawkins, Ryan B. (SDO) <RHawkins@perkinscoie.com>
Date: Thursday, October 6, 2022 at 3:28 PM
To: Amber Magee <AMagee@susmangodfrey.com>, Edlin, Elise (SFO) <EEdlin@perkinscoie.com>, Piepmeier, Sarah (SFO) <SPiepmeier@perkinscoie.com>, Griggs, Angela (SFO) <AGriggs@perkinscoie.com>
Cc: Ryan Caughey <rcaughey@susmangodfrey.com>, Max Tribble <MTRIBBLE@SusmanGodfrey.com>, Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>, Bryce T. Barcelo <BBarcelo@susmangodfrey.com>, Stacy Schulze <SSCHULZE@SusmanGodfrey.com>, Vanessa Keller <VKeller@susmangodfrey.com>, Maria Romo <MRomo@susmangodfrey.com>, Alex Kaminsky <AKaminsky@susmangodfrey.com>, *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>
Subject: RE: Paltalk v. Cisco: Cisco's Outstanding Depositions

EXTERNAL Email

Amber,

Thank you for speaking with us yesterday. As discussed, Cisco believes Paltalk's continued refusal to agree to an extension to the Court's schedule will result in significant waste of resources and prejudice, especially if this tact necessitates supplemental expert reports. When Cisco again sought to mitigate this yesterday Paltalk claimed that it did not know if it would be seeking leave to supplement its expert reports and that any discussion of supplemental reports and/or extensions should be had "another day." Every day that Paltalk has put this off over the past three weeks and wants to continue to do so in the coming weeks compounds the prejudice.

So while we still believe an extension to the schedule is the appropriate way to address this, Cisco will nonetheless agree to Paltalk's request to stipulate to Paltalk's taking Mr. Barave and Mr. Belcher's deposition out of time, without any extension to the schedule, in order to resolve this issue.

We can confirm Mr. Barave's deposition for Tuesday but we are still working with Mr. Belcher to confirm a date.

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E. RHawkins@perkinscoie.com

From: Amber Magee <AMagee@susmangodfrey.com>

Sent: Wednesday, October 5, 2022 1:53 PM

To: Hawkins, Ryan B. (SDO) <RHawkins@perkinscoie.com>; Edlin, Elise (SFO) <EEEdlin@perkinscoie.com>; Piepmeier, Sarah (SFO) <SPiepmeier@perkinscoie.com>; Griggs, Angela (SFO) <AGriggs@perkinscoie.com>

Cc: Ryan Caughey <rcaughey@susmangodfrey.com>; Max Tribble <MTRIBBLE@SusmanGodfrey.com>; Kalpana Srinivasan <ksrinivasan@SusmanGodfrey.com>; Bryce T. Barcelo <BBarcelo@susmangodfrey.com>; Stacy Schulze <SSSCHULZE@SusmanGodfrey.com>; Vanesa Keller <VKeller@susmangodfrey.com>; Maria Romo <MRomo@susmangodfrey.com>; Alex Kaminsky <AKaminsky@susmangodfrey.com>; *Cisco-Paltalk-Service <Cisco-Paltalk-Service@perkinscoie.com>

Subject: Re: Paltalk v. Cisco: Cisco's Outstanding Depositions

Counsel,

Thanks for this afternoon's meet and confer. Here's what we discussed:

- Pending approval from Cisco, the parties agree to stipulate to taking Barave and Belcher's depositions after the 09/22 close of fact discovery while leaving all other deadlines intact. Barave and Belcher will cover all agreed upon outstanding 30(b)(6) topics.
- Paltalk will confer with Cisco should it seek to supplement or amend its expert reports based on the depositions.

Paltalk also requests that Belcher and Barave be made available for deposition next week. Their prompt presentment will allow Paltalk to supplement its infringement report, if necessary, before Cisco serves its rebuttal infringement report on October 27th.

Please let us know if we have an agreement.

Amber Magee

From: Amber Magee <AMagee@susmangodfrey.com>

Date: Tuesday, October 4, 2022 at 9:27 PM

To: Hawkins, Ryan B. (SDO) <RHawkins@perkinscoie.com>, Edlin, Elise (SFO) <EEedlin@perkinscoie.com>, Piepmeier, Sarah (SFO) <SPiepmeier@perkinscoie.com>, Griggs, Angela (SFO) <AGriggs@perkinscoie.com>

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That time works for Paltalk as well. I'll send an invite.

Amber Magee

From: Hawkins, Ryan B. (SDO) <RHawkins@perkinscoie.com>

Date: Tuesday, October 4, 2022 at 5:44 PM

To: Amber Magee <AMagee@susmangodfrey.com>, Edlin, Elise (SFO) <EEedlin@perkinscoie.com>, Piepmeier, Sarah (SFO) <SPiepmeier@perkinscoie.com>, Griggs, Angela (SFO) <AGriggs@perkinscoie.com>

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Subject: RE: Paltalk v. Cisco: Cisco's Outstanding Depositions

EXTERNAL Email

Amber,

Cisco can be available tomorrow at 12:30pm PT.

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E. RHawkins@perkinscoie.com

From: Amber Magee <AMagee@susmangodfrey.com>

Sent: Tuesday, October 4, 2022 11:49 AM

To: Hawkins, Ryan B. (SDO) <RHawkins@perkinscoie.com>; Edlin, Elise (SFO) <EEedlin@perkinscoie.com>; Piepmeier, Sarah (SFO) <SPiepmeier@perkinscoie.com>; Griggs, Angela (SFO) <AGriggs@perkinscoie.com>

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Subject: Re: Paltalk v. Cisco: Cisco's Outstanding Depositions

Ryan,

Paltalk has twice requested times when Cisco is available to meet and confer about these issues, but Cisco has not provided any times to meet and confer. When is Cisco's lead counsel available to meet and confer with Paltalk's lead counsel on Wednesday and Thursday of this week? Paltalk is available for most of tomorrow. If Cisco has not responded with any availability for a meet and confer by 5pm CT tomorrow, Paltalk will note Cisco's refusal to meet and confer in its letter to the Court.

Amber Magee

From: Hawkins, Ryan B. (SDO) <RHawkins@perkinscoie.com>

Date: Tuesday, October 4, 2022 at 10:43 AM

To: Amber Magee <AMagee@susmangodfrey.com>, Edlin, Elise (SFO) <EEEdlin@perkinscoie.com>, Piepmeier, Sarah (SFO) <SPiepmeier@perkinscoie.com>, Griggs, Angela (SFO) <AGriggs@perkinscoie.com>

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Subject: RE: Paltalk v. Cisco: Cisco's Outstanding Depositions

EXTERNAL Email

Amber,

Cisco's position has not changed. Since Paltalk cancelled the depositions due to its own scheduling conflicts and requested an extension in order to accommodate them being rescheduled, Cisco has been and is still amenable to an extension to the schedule to allow Mr. Barave and Mr. Belcher to be deposed. Of course, a limited, both in time and in scope extension of the Court's ordered schedule is required to allow that. Yet last week Paltalk stated unequivocally that "we will not be able to agree to any extension. We will keep the current schedule." If Paltalk's position has changed and it is again willing to negotiate an extension to the schedule, please let us know. But as fact discovery is closed, an extension to the schedule, with appropriate limitations as to both time and scope, is required in

order to reschedule these depositions and we are happy to negotiate that extension with you.

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From: Amber Magee <AMagee@susmangodfrey.com>

Sent: Friday, September 30, 2022 2:12 PM

To: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>; Hawkins, Ryan B. (SDO) <RHawkins@perkinscoie.com>; Piepmeier, Sarah (SFO) <SPiepmeier@perkinscoie.com>; Griggs, Angela (SFO) <AGriggs@perkinscoie.com>

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Subject: Paltalk v. Cisco: Cisco's Outstanding Depositions

Counsel,

I write about Cisco's outstanding depositions. Paltalk requested both 30(b)(1) and 30(b)(6) testimony well within the discovery period, and Paltalk renews its requests that Cisco present Barave, Belcher, and all other outstanding 30(b)(6) witnesses for deposition.

Paltalk served a Rule 30(b)(6) notice on August 10th, well before the close of fact discovery, and Cisco agreed to present witnesses to testify on various topics. Cisco has not yet presented 30(b)(6) witnesses on a number of topics, including topics assigned to Messrs. Barave and Belcher and topics 30, 37, and 38, which were formerly assigned to Mr. Boyles. Cisco ultimately chose to designate a half dozen witnesses to cover Paltalk's topics, while simultaneously refusing to make Barave, Boyles, Hamilton, and Buckles available until the last week of discovery and refusing to timely assign witnesses to various 30(b)(6) topics.

- With respect to Belcher, Paltalk requested his 30(b)(1) deposition on August 3rd. Cisco did not provide a date for Belcher's deposition until August 26th, more than three weeks after Paltalk's initial request. Cisco offered a single date for Belcher, September 21st, which was only one day before the close of discovery. Paltalk was not able to depose Mr. Belcher on 09/21, and on 09/19, Ms. Edlin said that Cisco was working to accommodate Paltalk's request for a second day of availability for Mr. Belcher. Cisco needs to provide an alternative date for Mr. Belcher where he can give both 30(b)(1) and 30(b)(6) testimony.

- With respect to Barave, Cisco formally identified Barave as a 30(b)(6) witness on September 8th and provided a single date for his deposition as well, September 16th. However, Paltalk's counsel was already preoccupied with Mr. Katz's two days of deposition that week. Still, Paltalk could have made September 16th work but for Cisco's continued refusal to identify the topics covered by Mr. Barave until September 10th. Given Cisco's delay in producing relevant documents or in even identifying the topics Mr. Barave will cover, Paltalk had insufficient time to prepare for Mr. Barave's September 16th deposition. Cisco needs to provide an alternative date for Mr. Barave's 30(b)(6) testimony.
- With respect to the topics not covered by Mr. Boyles, Cisco designated Mr. Boyles to cover a number of financial topics, including topics 30, 37, and 38. During Mr. Boyles's deposition, it became apparent that he was not prepared to fully testify on topic 30 (see Boyles Tr. 47:5-48:1.) or give any testimony on topics 37 and 38 (Boyles Tr. 106:1-25). Cisco agreed to present alternate witnesses for the remainder of topic 30, topic 37, and topic 38, and Cisco now needs to present those witnesses.

Per Ms. Edlin's September 19th email (sent just three days before the close of discovery), Cisco said it would send Belcher and Barave's ability as soon as they were able to confirm dates. During Mr. Boyles's September 20th deposition, Ms. Edlin also said that Cisco would designate additional witnesses for topics 30, 37, and 38. At no point during fact discovery did Cisco suggest that it would not be presenting these witnesses, and Cisco offered to find dates after the formal close of discovery, so these depositions could be taken by agreement. In fact, Cisco unilaterally offered to present several of its 30(b)(6) witnesses (Buckles and Hamilton) *after* the 09/22 close of fact discovery per Ms. Edlin's August 26th email.

If Cisco's position has now changed and Cisco intends to renege on its agreements to present Belcher, Barave, and all other outstanding 30(b)(6) witnesses, please agree that this email serves as our conference or provide times when you are available to meet and confer on Monday and Tuesday.

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